

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

McAllen Division

V.

CRIMINAL COMPLAINT

Pamela Evelyn Montelongo

Case Number: M-18-1858-M

YOB: 1987

COC: United States

Name and Address of Defendant

I the undersigned complainant, state the following is true and correct to the best of my knowledge and belief. On or about September 5, 2018 in Hidalgo County, in the Southern District of Texas defendant(s) did,

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law and brought the alien for the purpose of commercial advantage or private gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) & 1324(a)(2)(B)(ii)
I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

See Attachment A

Continued on the attached sheet and made a part of this complaint:

☐ Yes☒ No

Sworn to before me and subscribed in my presence,

Approved By: **A. Andrade**September 5, 2018 8:35 AM

Date

Juan F. Alanis

U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Complainant

Nidia Trevino

Printed Name of Complainant

McAllen, Texas

City and State

Signature of Judicial Officer

Attachment A

The defendant, a United States citizen and driver of the vehicle, attempted to bring illegally into the United States through the Hidalgo Port of Entry an undocumented minor C.T.M.R. (female, 11 years old), a Mexican citizen, as a United States citizen. At primary, the defendant claimed the child as her own and presented a City of McAllen, Texas birth certificate bearing the name A.X.L.M. as proof. She also presented documentation for her two sisters, son, and nephew. All the passengers were referred into secondary due to C.T.M.R. appearing nervous and not being able to answer basic questions.

In secondary, the defendant claimed C.T.M.R. was her child. Upon further inspection, the defendant admitted she was not the child's mother and that the child was not a United States citizen. The defendant stated that she did not know the child's name, and did not have any information regarding the child's parents. The defendant went on to state her friend "Brenda" had propositioned her to bring the child into the United States illegally. She admitted that on or about September 3, 2018, an acquaintance delivered the child at her mother's residence in Reynosa, Tamaulipas. Once there, the child was asked to memorize the name on the document and was coached to provide that name to the officers at the Port of Entry. The defendant admitted that it was her idea to use her true child's birth certificate to facilitate C.T.M.R.'s illegal entry.

The defendant stated that she was taking the child to the Wal-Mart store located in Hidalgo, Texas. Once there, she was to turn the child over to Brenda. For her services, the defendant admitted that Brenda was going to pay her \$1,500 dollars.

Database queries revealed C.T.M.R. did not have any legal status to enter the United States. The child was transported to the McAllen Central Processing Center for temporary housing.